

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES
AND PRODUCTS LIABILITY
LITIGATION

Case No. 3:16-md-2738-MAS-RLS

MDL Case No. 2738

**DECLARATION OF STEPHEN D. BRODY CERTIFYING COMPLIANCE
WITH LOCAL RULE 37.1(B)(1)**

I, Stephen D. Brody, hereby declare and state as follows:

1. I am over the age of eighteen, of sound mind, and in all respects competent to testify. I have personal knowledge of the information contained in this Declaration and would testify completely to these facts if called to do so.

2. I represent Defendants Johnson & Johnson and LLT Management, LLC (collectively, “J&J”) in the above-captioned litigation.

3. A true and correct copy of a February 28, 2024 letter from counsel for PricewaterhouseCoopers, LLP (“PwC”) to Michelle Parfitt containing PwC’s objections to Plaintiffs’ February 15, 2024 subpoena is attached as Exhibit 1 to this Declaration.

4. A true and correct copy of my February 28, 2024 letter to Ms. Parfitt is attached as Exhibit 2 to this Declaration.

5. I certify that on February 28, 2024, J&J met and conferred in good faith with members of the Plaintiffs' Steering Committee to discuss J&J's objections to the February 15 subpoena, as required by Rule 37.1(B)(1).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of February, 2024.

/s/ Stephen D. Brody

Stephen D. Brody

*Counsel for Defendants Johnson & Johnson
and LLT Management, LLC*